

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :  
 :  
 v. : Criminal No. -14-050-16  
 :  
 DWAYNE TOWNSEND :

**DEFENDANT DWAYNE TOWNSEND'S CONSENT MOTION  
TO EXTEND DEADLINE TO FILE PRETRIAL MOTIONS**

Defendant Dwayne Townsend, by and through his undersigned counsel, and with the consent of the United States government, hereby seeks a thirty (30) day extension of time in which to file pretrial motions, and in support hereof states the following:

1. On or about March 18, 2013, Mr. Townsend was charged by Criminal Complaint with conspiracy to distribute, and to possess with intent to distribute, one kilogram or more of a mixture or substance containing a detectable amount of heroin, in violation of 21 U.S.C. § 846 and 21 U.S.C. §§ 841(a)(1), (b)(1).

2. On or about March 26, 2013, Mr. Townsend was arrested on the charges laid in the Complaint.

3. On or about April 8, 2013, an attorney, other than undersigned attorney, entered his appearance on behalf of Mr. Townsend.

4. On or about April 23, 2013, Mr. Townsend had his initial appearance in front of Magistrate Judge Karen M. Williams, at which time Mr. Townsend consented to detention.

5. For reasons that are unclear from the docket, an Indictment in this matter was not returned until February 5, 2014. The Indictment charged Mr. Townsend and several other defendants with, from in or about October 2012 until March 2013, knowingly and intentionally conspiring with one another, and others, to distribute and to possess with intent to distribute one

kilogram or more of a mixture and substance containing a detectable amount of heroin, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1), and 21 U.S.C. § 846.

6. On or about April 25, 2014, the Court entered a scheduling order and among other things, set the deadline for filing pretrial motions for July 31, 2014 and ordered trial to commence on October 6, 2014.

7. On or about June 4, 2014, a Superseding Indictment was returned, charging Mr. Townsend with one count of conspiracy to distribute and possess with intent to distribute one or more kilograms of heroin, in violation of 21 U.S.C. § 846; one count of using a firearm during a violent crime/drugs, in violation of 18 U.S.C. § 924(c)(1)(A); and various counts of using a communication facility in furtherance of a drug conspiracy, in violation of 21 U.S.C. § 843(b).

8. On or about June 26, 2014, Mr. Townsend's prior counsel was relieved of his duty to represent Mr. Townsend. It was not until this time that undersigned counsel became involved in this case, and was appointed under the Criminal Justice Act to represent Mr. Townsend.

9. Since the time of his appointment, undersigned counsel has assiduously endeavored to immerse himself in the case. However, even given undersigned counsel's diligent efforts to play "catch up," undersigned counsel has received no less than fifteen (15) discs of discovery, amounting to tens of thousands of pages to review.

10. Given the vast amount of discovery associated with this case and the fact that undersigned counsel has been involved in this case for less than one month from the date of this Motion, undersigned counsel requests a thirty (30) day extension in which to file pretrial motions to allow him to carefully review the discovery to determine what motions may be appropriate to file.

11. Undersigned counsel has discussed this Motion with Assistant United States Attorney Justin Danilewitz, who represents the government in this matter. AUSA Danilewitz has authorized undersigned counsel to inform the Court that the government does not oppose this request.

WHEREFORE, for all of the above reasons, it is respectfully requested that the Court extend the deadline to file pretrial motions by thirty (30) days.

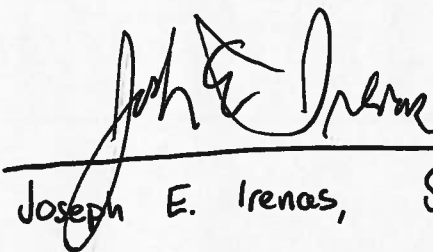
Respectfully submitted,

CEDRONE & MANCANO, LLC

Dated: July 25, 2014

By: /s/ Joseph D. Mancano  
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So Ordered, this <sup>29th</sup> — day of July, 2014. Defendant Dwayne Townsend's pre-trial motions shall be due on or before Friday, August 29, 2014. The Government shall file opposition, if any, on or before Friday, September 12, 2014. The Court shall hear these motions on Friday, September 19, 2014, at 10:00 AM in Courtroom 5A.

  
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Joseph E. Irenas, S.U.S.D.J.